

FEDERAL DEFENDER SERVICES  
OF WISCONSIN, INC.

LEGAL COUNSEL

Craig W. Albee, Federal Defender  
Krista A. Halla-Valdes, First Assistant

Joseph A. Bugni, Madison Supervisor  
Elizabeth Blair  
John W. Champion  
Jessica Arden Ettinger  
Anderson M. Gansner  
Jonathan Greenberg  
Gabriela A. Leija  
Dennise Moreno  
Ronnie V. Murray  
Tom Phillip  
Joshua D. Uller  
Alex Vlisides  
Kyle Kent, Diversity Fellow

22 East Mifflin Street  
Suite 1000  
Madison, Wisconsin 53703

Telephone 608-260-9900  
Facsimile 608-260-9901

November 4, 2022

The Honorable James D. Peterson  
United States District Chief Judge  
120 N. Henry Street  
Madison, Wisconsin 53703

Re: *United States v. Kristopher Halverson*  
Case No. 21-cr-72-jdp

To the Honorable James D. Peterson,

In anticipation of sentencing, and in support of the parties 11(c)(1)(c) plea of six years, the defense submits this memorandum. Given that six years is a reasonable sentence and that the parties have come to that agreement after a deep immersion in the facts of the case, this memorandum will be refreshingly brief. There are three core points to stress.

First, the plea agreement puts this case to rest and spares the parties from further litigation and the victims from any further uncertainty. Given that the Court could reject the plea agreement and this case could still have to go to trial, the defense will not go into all the potential defenses and motions, but needless to say there is value in resolving cases along the terms the parties have agreed to.

Second, the plea agreement provides a sentence that the defense and the government and the victims all believe is both reasonable and just. In the context of a simple joint recommendation, this Court once observed that if Ms. Altman and myself agree on something – anything – it carries great weight. The same principles apply here.

FEDERAL DEFENDER SERVICES  
OF WISCONSIN, INC.

Page -2-

Third, while this plea provides an appropriate resolution, avoids trial, and provides a sentence everyone is comfortable with, this plea is also somewhat limited. The protections it offers govern this case and this jurisdiction. If other allegations should be prosecuted elsewhere, then that's an issue for a different judge on a different day. But when it comes to this case and this charge and this sentence, the Court should accept the binding plea and sentence Mr. Halverson accordingly.

Thank you for your attention to this matter.

Sincerely,

*/s/ Joseph A. Bugni*

Joseph A. Bugni  
Associate Federal Defender